

Exhibit A

[REDACTED]

[REDACTED]

From: John Davis <jdavis@slackdavis.com>

Date: Monday, December 14, 2020 at 8:21 PM

To: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>

Cc: Conlee Whiteley <c.whiteley@kanner-law.com>, Ruben Honik <ruben@honiklaw.com>, Adam Slater <ASlater@mazieslater.com>, Daniel Nigh <dnigh@levinlaw.com>, "CohenL@gtlaw.com" <CohenL@gtlaw.com>, "lockardv@gtlaw.com" <lockardv@gtlaw.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "CCT@pietragallo.com" <CCT@pietragallo.com>, "Jason M. Reefer" <JMR@pietragallo.com>, "Bazan, Rebecca" <REBazan@duanemorris.com>

Subject: Re: Valsartan - Motion to Amend Meet/Confer

Seth, we still don't believe this is necessary or required for a productive meet-confer. And as I mentioned last week, we said we would like to file the motion today. We are holding off so that you can review these documents provided as a professional courtesy. I am attaching MS Word red-lines (if available) or pdf compare reports of the draft complaints to the as-filed in each of the underlying cases and for the master complaint. Of course, we waive no privileges in providing you these red-lines. Please review and let us know by COB tomorrow whether Defendants will oppose. If you have any questions, I can make myself available for a phone call. Thanks and regards,

John

From: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>

Date: Saturday, December 12, 2020 at 7:55 AM

To: John Davis <jdavis@slackdavis.com>

Cc: Conlee Whiteley <c.whiteley@kanner-law.com>, Ruben Honik <ruben@honiklaw.com>, Adam Slater <ASlater@mazieslater.com>, Daniel Nigh <dnigh@levinlaw.com>, "CohenL@gtlaw.com" <CohenL@gtlaw.com>, "lockardv@gtlaw.com" <lockardv@gtlaw.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "CCT@pietragallo.com" <CCT@pietragallo.com>, "Jason M. Reefer" <JMR@pietragallo.com>, "Bazan, Rebecca" <REBazan@duanemorris.com>

Subject: Re: Valsartan - Motion to Amend Meet/Confer

John,

I had hoped to email you yesterday, but the day got away from me. A number of Defendants have expressed that they cannot provide their consent without reviewing the proposed amendments. Given that Plaintiffs have to submit the proposed amendments with their motion for leave, and you represented that Plaintiffs are prepared to do so, they do not see any reason why Plaintiffs should not provide them now, in connection with the meet and confer to obtain Defendants' position. Could you please send them to me this weekend so that I can share with defense counsel.

As we discussed, we intend to get back to you promptly with our position on the proposed amendment and the deposition schedule.

Seth

Seth A. Goldberg
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sagoldberg@duanemorris.com

On Dec 10, 2020, at 10:45 AM, John Davis <jdavis@slackdavis.com> wrote:

Seth, Victoria, and Greg,

Thanks for speaking with us today. I understand that we all have some issues with the current discovery deadline, but we need to work within the current parameters set by the Court unless and until the Court changes those parameters. And as Conlee said, to the extent we are able, we are committed to working with you on deposition scheduling. Please let us know whether you oppose our Motion for Leave to Amend by

COB Monday. When we file next week, you'll receive substantially complete PFSs as well as proposed deposition dates with more fulsome information. Attached is the information you asked for regarding the proposed named representatives. I mentioned that one current rep, Anna Cleaver, wishes to withdraw due to family-related reasons. Removing her will also be part of the motion. Thanks and please reach out with any further questions.

John

From: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>

Date: Thursday, December 10, 2020 at 8:13 AM

To: John Davis <jdavis@slackdavis.com>, Conlee Whiteley <c.whiteley@kanner-law.com>, Ruben Honik <ruben@honiklaw.com>, Adam Slater <ASlater@mazieslater.com>, Daniel Nigh <dnigh@levinlaw.com>, "CohenL@gtlaw.com" <CohenL@gtlaw.com>, "lockardv@gtlaw.com" <lockardv@gtlaw.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "CCT@pietragallo.com" <CCT@pietragallo.com>, "Jason M. Reefer" <JMR@pietragallo.com>, "Bazan, Rebecca" <REBazan@duanemorris.com>

Subject: RE: Valsartan - Motion to Amend Meet/Confer

9:30 is fine. Will get back on. My mistake.

<image001.jpg>

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From: John Davis <jdavis@slackdavis.com>
Sent: Thursday, December 10, 2020 9:11 AM
To: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Conlee Whiteley <c.whiteley@kanner-law.com>; Ruben Honik <ruben@honiklaw.com>; Adam Slater <ASlater@mazieslater.com>; Daniel Nigh <dnigh@levinlaw.com>; CohenL@gtlaw.com; lockardv@gtlaw.com; OstfeldG@gtlaw.com; CCT@pietragallo.com; Jason M. Reefer <JMR@pietragallo.com>; Bazan, Rebecca <REBazan@duanemorris.com>
Subject: Re: Valsartan - Motion to Amend Meet/Confer

I have it for 830am central/930 am eastern. I'm happy to join the call right now thought if that works better for you.

From: "Goldberg, Seth A." <SAGoldberg@duanemorris.com>
Date: Thursday, December 10, 2020 at 8:09 AM
To: John Davis <jdavis@slackdavis.com>, Conlee Whiteley <c.whiteley@kanner-law.com>, Ruben Honik <ruben@honiklaw.com>, Adam Slater <ASlater@mazieslater.com>, Daniel Nigh <dnigh@levinlaw.com>, "CohenL@gtlaw.com" <CohenL@gtlaw.com>, "lockardv@gtlaw.com" <lockardv@gtlaw.com>, "OstfeldG@gtlaw.com" <OstfeldG@gtlaw.com>, "CCT@pietragallo.com" <CCT@pietragallo.com>, "Jason M. Reefer" <JMR@pietragallo.com>, "Bazan, Rebecca" <REBazan@duanemorris.com>
Subject: RE: Valsartan - Motion to Amend Meet/Confer

John, I waited on the line, but a host never opened. Let me know if you would like to reschedule.

Seth

<image002.jpg>

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-----Original Appointment-----

From: John Davis <jdavis@slackdavis.com>

Sent: Tuesday, December 8, 2020 10:05 AM

To: John Davis; Goldberg, Seth A.; Conlee Whiteley; Ruben Honik; Adam Slater; Daniel Nigh; CohenL@gtlaw.com; lockardv@gtlaw.com; OstfeldG@gtlaw.com; CCT@pietragallo.com; Jason M. Reefer; Bazan, Rebecca

Subject: Valsartan - Motion to Amend Meet/Confer

When: Thursday, December 10, 2020 8:30 AM-9:15 AM (UTC-06:00) Central Time (US & Canada).

Where:

+1 (267) 930 4000

Participant Access: 575 245 264

Host Access (JD): 517 802 944

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<Mot for Leave to Amend Rep Info.pdf>

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